

**Before The
Federal Communications Commission
Washington, DC**

In the Matter of)	
)	
Digital Audio Broadcasting Systems and Their)	MM Docket No. 99-325
Impact on the Terrestrial Broadcast Service)	
)	
)	

To: The Commission

**COMMENTS OF
JOURNAL BROADCAST CORPORATION**

Journal Broadcast Corporation ("Journal") is a subsidiary of Journal Communications, Inc. Journal Communications, Inc. is the oldest employee owned company in the United States of America. Journal owns and operates thirty-six radio stations and five television stations located in eleven states, and has been in the broadcasting business since 1928 with a long history of strong community support and public service.

Journal has expended considerable resources in investigating the potential of an IBOC digital radio system. Andy Laird, the Vice President of Radio Engineering of a Journal subsidiary, has served as an industry volunteer with the NRSC Digital Audio Broadcast (DAB) Subcommittee for the last ten years. He currently chairs the Test Procedures Working Group (TPWG) of the NRSC DAB Subcommittee, and serves on the Evaluation Working Group (EWG) of the DAB Subcommittee. These working groups of the DAB Subcommittee established the testing program and evaluation program to generate the Report on which the FCC is requesting comment. Journal has no direct relationship or ownership interest in iBiquity and no Journal stations were used for

IBOC testing. These comments focus on the NRSC Testing and Evaluation of the AM IBOC system and are in addition to our comments previously filed concerning the FM IBOC system.

Journal concurs with the Conclusions and Recommendations of the National Radio Systems Committee's (NRSC) "Evaluation of the iBiquity Digital Corporation IBOC System", Part 2 AM IBOC. The report clearly summarizes the test results that demonstrate that AM IBOC works for Daytime Service and that the benefits of AM IBOC are substantial.

Pending iBiquity's successful incorporation of the PAC v4 compression technology in place of the tested system's AAC coding, Journal believes that there is sufficient information for the FCC to endorse AM IBOC as tested, with no other changes, for Daytime Service.

Journal believes that the NRSC conclusions show that AM IBOC has the potential to technically transform AM radio broadcasting. However, Journal believes that, for this transformation to take place, the service will need to be fulltime. But Journal strongly encourages the FCC to rapidly endorse AM IBOC for Daytime Service while additional research and industry dialog take place focused toward an endorsement of nighttime operation.

Daytime Service endorsement has no risk of creating harmful interference.

Immediate endorsement will encourage receiver manufacturers to include AM IBOC in their first generation receivers. This is vital for AM stations. If the first generation of IBOC receivers do not support AM IBOC, AM will be left for the next receiver design cycle delaying receiver availability for a year or two. And a first generation digital receiver without AM IBOC would not be compatible with an eventual all-digital AM band system. For a smooth transition and to achieve the transmission flexibility IBOC technology provides, it is important that all digital receivers are capable of supporting the digital modes of both the FM and AM IBOC systems.

Endorsement of the AM IBOC standard for Daytime Service does not require stations to convert but it will give them the flexibility to move forward with IBOC at their own pace. Journal also notes that major benefits are achieved with the all-digital mode of AM IBOC, that the hybrid system is an analog compatible, transitional technology. The hybrid technology is the interim step toward the final technical goal for the AM band, an all-digital system. IBOC is the only digital broadcast technology providing an analog compatible step toward an all-digital system. A clear endorsement of AM IBOC by the FCC will start the process toward all-digital transmission in the AM frequency band for the United States.

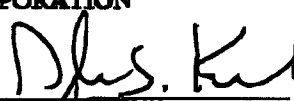
All but one of ten tentative selection criteria for DAB systems listed in the Notice of Proposed Rule Making are addressed in the report. Number 10 (not addressed), “implementation costs/affordability of equipment” – is being addressed by many manufacturers of transmission and receiver equipment. Journal’s discussions with many of these manufacturers indicate that implementation of the iBiquity IBOC system will not be cost prohibitive for either broadcasters or consumers.

As a result, Journal supports the iBiquity system as the IBOC standard for the United States and believes that the Commission should endorse this technology and proceed to set the iBiquity system as the standard, both hybrid and all-digital modes, for the United States.

Accordingly, Journal urges the Commission to move forward with the proposed iBiquity system so that the radio industry can begin its own digital transition as promptly as possible.

Respectfully Submitted,

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